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MEMO ENDORSED

March 2, 2021

VIA ECF

Hon Sidney H. Stein, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Walfish v. Northwestern Mutual et al., No. 1:16-cv-05534

Dear Judge Stein:

This firm represents Defendants Northwestern Mutual Life Insurance Company and Matthew Holleran (collectively, "Defendants") in the above-referenced action. We write, with the consent of Plaintiff and pursuant to Your Honor's Individual Practices and the Southern District of New York Sealed Records Filing Instructions on the Court's website, to seek leave to file under seal certain briefing and accompanying exhibits in support of Defendants' Opposition to Plaintiff's Motion In Limine concerning Plaintiff's tax returns and Defendants' cross-motion for an adverse inference, which is being filed today, March 2, 2021.

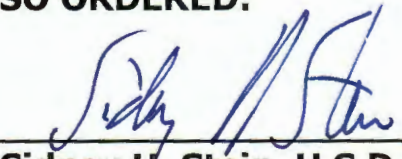
In support of Defendants' opposition and motion, we will be submitting to the Court certain documents that contain "sensitive information," as defined by the Electronic Case Filing Rules & Instructions for this District, and/or which have been designated as "Confidential," pursuant to the Discovery Confidentiality Order that was entered in the related case, *Walfish et al. v. Northwestern Mutual Life Insurance Company, et al*, D.N.J. 16-cv-4981 (WJM) (MF), but which the parties have agreed governs documents produced in this and the related case. A copy of the Discovery Confidentiality Order is enclosed. The documents at issue include the Schedule C's from Plaintiff's tax returns and compensation amounts reflected in Plaintiff's tax returns.

In light of the sensitive and confidential nature of the materials at issue, Defendants respectfully request that the Court grant them leave to file these exhibits and any corresponding portions of Defendants' briefing referencing the confidential information under seal in accordance with the applicable Local Rules.

Request to seal the documents set forth in this letter granted.

**Dated: New York, New York
March 5, 2021**

SO ORDERED:


Sidney H. Stein, U.S.D.J.

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We thank the Court for its consideration of this request.

Respectfully submitted,
/s/ Sean P. Lynch

Sean P. Lynch

cc: All counsel of record